

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

PETER J. MILLER, an individual,
CLIFFORD HOYT, an individual, and
CAMBRIDGE RESEARCH AND
INSTRUMENTATION, INC.,
a Delaware corporation,

Plaintiffs,

v.

PATRICK TREADO, an individual, and
CHEMIMAGE CORP., a Delaware
corporation,

Defendants.

Civil Action No. 05-10367-RWZ

**JOINT MOTION TO AMEND
SCHEDULING ORDER**

Counsel for plaintiffs Cambridge Research and Instrumentation, Inc., Peter J. Miller, and Clifford Hoyt (collectively, "CRI"), and counsel for defendants ChemImage Corporation and Patrick Treado (collectively, "ChemImage") jointly move to amend the October 28, 2005 Scheduling Order [Docket Entry, "D.E.", 28] for this case in order to provide sufficient time to complete discovery. The amendments will result in moving each deadline forward by ninety days. The proposed scheduling order is attached (**Exhibit A**).

This request is not interposed for purposes of delay.

Specifically, the parties request the following amendments:

Event	Previously Scheduled Dates	Proposed Dates
Completion of fact discovery: deadline for: - completion of non-expert depositions - responses to all discovery requests	May 1, 2006	August 1, 2006
Identification of Experts (FRCP 26(a)(2)(A))	May 15, 2006	August 15, 2006
Opening Expert Reports - i.e., for which the party has the burden of proof (FRCP 26(a)(2)(B))	June 15, 2006	September 15, 2006
Rebuttal Expert Reports (FRCP 26(a)(2)(B))	July 15, 2006	October 15, 2006
Completion of Expert Depositions	August 15, 2006	November 15, 2006
Filing and service of Motions for Summary Judgment	September 15, 2006	December 15, 2006
Filing and service of oppositions to Motions for Summary Judgment	October 6, 2006	January 12, 2007
Filing and service of replies to oppositions (5 page limit)	October 13, 2006	January 19, 2007

Respectfully submitted,

**PETER J. MILLER,
CLIFFORD HOYT, and
CAMBRIDGE RESEARCH AND
INSTRUMENTATION, INC.**

**PATRICK TREADO, and
CHEMIMAGE CORPORATION**

By their attorneys,

By their attorneys,

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Joint Motion
To Amend Scheduling Order

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DATED: March 14, 2006

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and a paper copy will be sent to those indicated as non-registered participants on March 14, 2006.

/s/ Teodor Holmberg
Teodor J. Holmberg (BBO# 634708)

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[PROPOSED] AMENDED SCHEDULING ORDER

It is hereby ordered that the following schedule will replace and supersede the Court's October 28, 2005 Scheduling Order [Docket Entry, "D.E.", 28]:

Event	Dates
Completion of fact discovery: deadline for: - completion of non-expert depositions - responses to all discovery requests	August 1, 2006
Identification of Experts (FRCP 26(a)(2)(A))	August 15, 2006
Opening Expert Reports - i.e., for which the party has the burden of proof (FRCP 26(a)(2)(B))	September 15, 2006
Rebuttal Expert Reports (FRCP 26(a)(2)(B))	October 15, 2006
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Dated: _____, 2006

RYA W. ZOBEL
UNITED STATES DISTRICT JUDGE